2012R00033/LSG

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Criminal No.

18 U.S.C. § 1343

v.

PETER LAREAU

INFORMATION

The defendant having waived in open court prosecution by
Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information, defendant PETER LAREAU, a resident of Mountain Lakes, New Jersey, created and used numerous entities, including T4Teens, LLC and Concordia Mediaworks, LLC (the "Lareau Ventures"), for the purpose of soliciting investors.

THE SCHEME TO DEFRAUD

2. From at least as early as in or about June 2004 through in or about January 2010, in Morris County, in the District of New Jersey, and elsewhere, defendant

PETER LAREAU

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud numerous investors and to obtain money and property from them by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such

scheme and artifice to defraud, did transmit and cause to be transmitted by means of wire communications in interstate commerce certain writings, signs, signals, pictures, and sounds as set forth below.

OBJECT OF THE SCHEME

3. It was the object of the scheme for defendant PETER LAREAU to enrich himself by inducing individuals to invest money in the Lareau Ventures while defendant PETER LAREAU, instead, retained and used the investors' funds for his own benefit and purposes.

MANNER AND MEANS OF THE SCHEME

- 4. It was part of the scheme that defendant PETER LAREAU would solicit and recruit victim-investors through civic, religious and/or charitable organizations, as well as through alumni events at prestigious educational institutions.
- 5. It was a further part of the scheme that, in soliciting victim-investors, defendant PETER LAREAU would falsely promise returns that were far in excess of returns otherwise generally available in the marketplace.
- 6. It was a further part of the scheme that, in addition to promising greater than market returns, defendant PETER LAREAU falsely represented that investors' funds would be used for educational television programming for teenage audiences.
- 7. It was a further part of the scheme that defendant PETER LAREAU sent victim-investors prospectuses and other information related to investment

opportunities by email.

- 8. It was a further part of the scheme that defendant PETER LAREAU directed some victim-investors to wire transfer funds from brokerage accounts located in New York to bank accounts in the name of his business ventures located in New Jersey.
- 9. It was a further part of the scheme that defendant PETER LAREAU did not use investor funds for educational programming or other business-related purposes as he had promised and represented to investors, but rather used those funds for personal expenses.
- 10. It was a further part of the scheme that defendant PETER LAREAU would make false statements and representations of encouragement to victim-investors to lull them into believing that their investments were secure, to prevent referral to law enforcement agencies and, in at least one instance, to obtain an additional financial commitment from investors.
- 11. It was a further part of the scheme that, in total, defendant PETER LAREAU misappropriated over \$500,000 in investors' money.
- 12. In furtherance of the above-described scheme and to achieve its objective, defendant

PETER LAREAU

transmitted and caused to be transmitted by means of wire, radio, or television communication in interstate commerce, a writing, sign, signal, picture and sound, in that, on or about December 24, 2009, defendant PETER LAREAU

transmitted an email to "GC," an investor, containing an investment agreement relating to Concordia Mediaworks LLC, which was in response to the investor's payment of \$25,000 to defendant PETER LAREAU.

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

- 1. The allegations contained in this Information are incorporated by reference as though set forth in full herein for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).
- 2. The United States hereby gives notice to defendant PETER LAREAU that, upon conviction of the offense charged in this Information, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461(c), which requires any person convicted of such offenses to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offenses.
- 3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant PETER LAREAU:
 - (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred or sold to, or deposited with, a third party;
 - (c) has been placed beyond the jurisdiction of the court;
 - (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in paragraph 2.

PAUL J. FISHMAN United States Attorney

CASE NUMBER:

United States District Court District of New Jersey

UNITED STATES OF AMERICA

>

PETER LAREAU

INFORMATION FOR

18 U.S.C. § 1343

PAUL J. FISHMAN

UNITED STATES ATTORNEY, NEWARK, NEW JERSEY

LORRAINE S. GERSON ASSISTANT U.S. ATTORNEY NEWARK, NEW JERSEY 973-645-2789